

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

DATE: **APR 22 2002**

SUBJECT: Inspection of General Iron Industries  
Chicago, Illinois 60614

FROM: Lynne Suesse, Environmental Scientist  
IL/IN Air Enforcement and Compliance Assurance Section  
Air Enforcement and Compliance Assurance Branch

TO: File

THRU: Brent Marable, Chief  
IL/IN Air Enforcement and Compliance Assurance Section  
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General Information:

Location: 1909 North Clifton Avenue  
Chicago, Illinois 60614

Phone: (847) 455-3300

Date: April 3, 2002

Participants: Lynne Suesse, Environmental Scientist, U.S. EPA  
Joseph Cardile, Environmental Engineer, U.S. EPA  
Adam Labkon, Plant Manager, General Iron

Purpose of Inspection:

U.S. EPA conducted an unannounced inspection of General Iron to ensure that it is following its Compliance Plan. General Iron drafted a Compliance Plan after U.S. EPA found the facility out of compliance with the Clean Air Act and CFC Regulations in 1999. Since 1999, as part of its Compliance Plan, General Iron has purchased two refrigerant recovery devices and devised a system of Verification Contracts and Verification Statements to collect from its scrap vendors and peddlars. The purposed of the inspection was to verify that General Iron was still using its recovery equipment and collecting the contracts and/or statements from its customers.

Our Arrival On Site:

We arrived at the site at approximately 1:00 p.m. We drove around the facility to see if we could witness any pedlars with refrigerant-containing appliances on their trucks. We parked near the entrance where pedlars and other trucks with scrap entered the scrap yard. As we observed the entrance, we saw several trucks line up to enter the yard through the dispatcher. As each truck pulled up near the dispatcher's window, he held up a paper with a number. The dispatcher then waved the truck through and into the yard. A pick-up truck containing two refrigerators was also waved into the yard. We could not see if the driver held up a number or not, but it appeared that he had not.

We drove around the scrap yard again to see if we could track the path through the yard of the truck containing the refrigerator. The netting on the fence made looking into the yard difficult. We decided to park our vehicle and go to the General Iron office to begin our inspection of the yard. As we parked, we saw the same pick-up truck containing the two refrigerators. It was outside the scrap yard. The driver of the truck, and another man, unloaded the refrigerators and two stoves from the back of his truck. We noted that the refrigerant circuits on the refrigerators were completely intact and appeared undamaged. We photographed these appliances.

At 1:34 pm, we entered the office of General Iron. We were told to wait to talk to Howard or Adam Labkon. After a few moments, we met Howard Labkon. We showed him our credentials and explained why we were there. After a moment, Adam Labkon appeared. Howard told Adam why we were there, then Howard left. Adam told us that he would be happy to answer any of our questions. We asked him how General Iron handles their refrigerant-containing appliances. Mr. Labkon explained that vendors show their vendor identification number upon entering the yard. This number is entered into the computer to verify if the vendor has a Verification Contract with General Iron. The computer will indicate whether that vendor had been approved to dispose of refrigerant-containing appliances from which the refrigerant had been properly recovered. If the vendor does not have a Verification Contract with General Iron, then the truck will be inspected for refrigerant-containing appliances and those appliances will be removed at the recovery area. At the recovery area, a General Iron employee will use recovery equipment to remove any remaining refrigerant in the appliances before. Mr. Labkon mentioned that General Iron also removes capacitors that contain PCBs from air conditioners and puts them in a drum to be

reclaimed, instead of sending the capacitors to a landfill.

We asked Mr. Labkon how many of his customers have Verification Contracts with General Iron. He replied that the majority of vendors have them. He went on to state that most of the vendors are repeat customers, sometimes bringing a load of scrap to General Iron twice in one day. We asked to see copies of the Verification Contracts. He then took us to the office and showed us the file containing approximately 300 contracts from vendors. We also asked to see the log that General Iron keeps of how many appliances were recovered each day. Upon glancing through the records, it appeared that General Iron recovers refrigerant from an average of five appliances a day. When the refrigerant is recovered, General Iron pays to have the freon picked up and replaced with empty containers from Full Circle Recovery in Bridgeview, Illinois. Mr. Labkon says that General Iron does not sell the freon that it collects from appliances.

At that time, we explained that we were interested in walking through the scrap yard to witness operations. Mr. Labkon obliged.

#### Site Tour

We began our walk through at the entrance gate. We noted the radiation detectors that each truck must pass through before it gets to the dispatcher. At the time that we walked into the gate, there were no trucks entering the facility. Mr. Labkon walked us through the dispatch area and showed us the refrigerant recovery area. There was one inspector working on duty in the recovery area that day. Mr. Labkon informed us that both recovery machines were in the shop being repaired, so no recovery could take place. As a result, there was a pile of about 50 air conditioners stockpiled at the recovery area, waiting to have their refrigerant recovered. We photographed the air conditioners stockpiled at the recovery area. We explained to Mr. Labkon at this time that how the appliances are unloaded from the trucks and handled is important, as rough handling as the appliances are unloaded can lead to accidental leaks of refrigerant. Other than the air conditioners, there were no refrigerators or other refrigerant-containing appliances in the recovery area. Mr. Labkon explained how the recovery is done and how the PCB-containing capacitors are removed from the air conditioners before going to the shredder. We waited in the recovery area to witness a few trucks with loads of scrap drive through. The inspector did a visual inspection of each truck, but none contained any refrigerant-containing appliances.

We then walked over to the scrap unloading area. In this area, trucks line up with their backs to the scrap. Each truck is unloaded by the driver and General Iron employees who throw the scrap and appliances out of the back of the vehicles. We did not see any refrigerators or refrigerant-containing appliances being unloaded. A large claw then picks up the scrap and dumps it in the shredder. Only one shredder was operating on this day. General Iron had just purchased a new shredder, as well. This new shredder was under construction. General Iron is constructing an enclosure around the shredder to minimize noise and emissions. The new shredder is also equipped with a water spray and foam spray to keep opacity and dust emissions at a minimum. Because the temperature inside the shredder is so high, there is no wastewater byproduct to be treated. Mr. Labkon claimed that the only emissions from this control would be steam. After several moments of witnessing the unloading and shredding, we decided to conclude the inspection.

#### Inspection Close

Mr. Labkon walked us back through the facility. We told him that our inspection for that day was concluded. We thanked him for his time and for showing us around. We left the facility at approximately 3:00 pm.